

## International Baby Food Action Network - IBFAN Red internacional de grupos pro alimentación infantil Réseau international des groupes d'action pour l'alimentation infantile



## Geneva Infant Feeding Association - GIFA

## 1998 Recipient of the Right Livelihood Award

## Statement Agenda item 5 (g) Framework of Engagement with Non-State Actors

64<sup>th</sup> Session of the WHO Regional Committee for Europe 15-18 September 2014

We appreciate the opportunity to make this statement on behalf of the International Baby Food Action Network, a global network of 273 organisations working to protect, promote and support breastfeeding.

We thank WHO EURO for the description of the process regarding the development of the Framework on engagement with non-state actors.

We have reviewed WHA's summary records and subsequent comments and questions provided by 15 Member States. We appreciate that short deadlines may have made it difficult for the WHO Secretariat to respond to the observations and questions raised by Member States. Yet, we are concerned that the report EUR/RC64/22 does not provide comprehensive responses and requested analyses, which would provide basis to advance discussions at this juncture.

We thus urge this and all other Regional Committees to seek out these responses and on their basis establish a comprehensive framework which ensures that WHO can truly fulfil its mandate and which protects WHO's integrity, independence and trustworthiness.

Therefore, and above all, the Framework needs to stop blurring the distinctions between actors who share the primary interest with WHO and those whose primary interest is market-led.

The Framework needs to be built on a thorough analysis of what worked and what did not in implementation of existing relevant policies and procedures, and on sound theoretical reflections, in particular on what constitutes individual and institutional conflicts of interests in global democratic health governance. It needs to facilitate prospective judgments whether a particular engagement should be prohibited, or permitted and managed in an appropriate and transparent manner. Finally, it needs to include the revolving doors and whistleblower protection issues.

As the Framework does not fulfil these needs, we respectfully disagree with those Member States who propose using the current draft Framework for a trial period, and see this as a great risk.

Thank you.